

Murrow, Patricia

From: Murrow, Patricia
Sent: Friday, September 11, 2015 1:16 PM
To: matt.thelen@wellmandynamics.com; Danette Grim; Richard F. Vannucci Jr., P. E.; Bob Compennolle; Mick.Leat@dnr.iowa.gov; randal.dahlin@idph.iowa.gov; Angela.leek@idph.iowa.gov; Johnson, Jeff; Ferguson, Bill; Hooper, Charles A.
Subject: FW: Wellman Dynamics Corporation, Creston, Iowa - August 7, 2015 Meeting Follow-up
Attachments: Wellman Dynamics Meeting Notes 7 Aug 2015 (MBL notes).docx; Wellman Dynamics FINAL Meeting Notes 7 Aug 2015.docx; Wellman-Murrow.pptx; Wellman Dynamics Map.pdf

Hello Everyone,

In follow-up to my email below, I did receive comments/revisions from Mick's Leat, IDNR, on the draft August 7th meeting notes. See attached file (MBL notes).

I have incorporated Mick's comments in the attached FINAL meeting notes and attachments.

If you have any questions on this matter, please let me know.

Again, thank you.

Pat

Patricia Murrow
US Environmental Protection Agency, Region 7
Air and Waste Management Division
Waste Remediation and Permitting Branch
11201 Renner Boulevard
Lenexa, KS 66219
(913) 551-7627 (office)
Murrow.patricia@epa.gov

From: Murrow, Patricia
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Subject: Wellman Dynamics Corporation, Creston, Iowa - August 7, 2015 Meeting Follow-up

Hello Everyone,

This email is in follow-up to our August 7, 2015, meeting at Wellman Dynamics Corporation in Creston, Iowa.

I would like to again thank Wellman Dynamics Corporation for hosting our meeting at their company. It was very helpful to have the meeting on location, especially since it allowed us to tour the landfill and see the location of the thorium disposal cell. I also appreciate everyone's attendance and our open discussion about your work associated with the landfill and disposal cell at the facility.

RCRA



606623

Meeting Notes

Wellman Dynamics Corporation
1746 Commerce Road, Creston, Iowa 50801
August 7, 2015
10:00 am – 1:30 pm

Participants

Wellman Dynamics Corporation –

Matt Thelen, Environmental Engineer
Danette Grim, Wellman plant president
Richard Vannucci, Penn E&R, engineering consultant

Fansteel –

Bob Compernelle, Controller

Iowa Department of Natural Resources –

Mick Leat, Solid Waste Section

Iowa Department of Public Health -

Randal S. Dahlin, Health Physicist, Bureau of Radiological Health, Division of ADPER & EH
Angela Leek, Bureau Chief for Radiological Health

US Environmental Protection Agency –

Pat Murrow, Project Manager, RCRA Corrective Action and Permits Section
Jeff Johnson, Section Chief, RCRA Corrective Action and Permits Section
Bill Ferguson, Geologist, U.S. Army Corps of Engineers (working for the EPA under an Interagency Agreement between EPA and COE)

Topics for Discussion

1. Introductions

2. Reaffirm Meeting's Goals and Objectives

- Landfill Discussion and Path Forward
- RCRA Corrective Action and Facility Investigation Work - Next Steps (EPA/Wellman Dynamics) – Discussed the application of LEAN tools to complete site-wide RCRA facility investigation work.

3. Discuss any Permits, Orders, etc. associated with the Landfill IDNR (Landfill)

- Landfill permit will be renewed soon, issued for 3 years. It will be a continuation of the old permit.
- Wellman is removing foundry sand and dross material. This material is being sent to another landfill for beneficial use.
- Landfill wells are being sampled for sulfide, fluoride, and metals (things expected from foundry sand).
- Proposed final landfill contour is to be used as closure. Have about 8.5 years left to get to final contour.
- Don't plan on removing all waste.
- The amount of material to be removed is based on removal of material to match existing grade around landfill.
- Proposed landfill cap will consist of two feet of impervious compacted clay overlain by a two-foot vegetative layer. Cap will be required by IDNR.
- A leachate collection system is in place. It consists of a toe-drain system along the downgradient landfill perimeter, but there is no liner present underneath the waste. There is monitoring associated with the system. Leachate is collected in a sump located at the southeast corner of the landfill. Leachate is pumped from sump to tank before discharge to POTW under pretreatment agreement.
- INDR recommends not waiting until final contour to begin cap construction.
- Materials are being stored near the landfill as a staging area but no material is being placed in the landfill.
- Typically, four truckloads of landfill material is removed on a daily basis. No newly-generated wastes are being placed in the landfill as it is shipped off-site for disposal.

IDPH (Thorium Disposal Cell)

- Current permit issued June 2015. Permit expires in 2019.
- Facility sought and received permission from NRC to dispose of the radiological waste.

- Rad waste disposal unit is adjacent to the landfill but is a separate area.
- Licensing requires monitoring to ensure that thorium is not getting into the groundwater.
- Barrels of thorium waste are to be removed at the same time as landfill closure.
- The disposal unit is inspected every three years, is a designated “no dig” zone, is within a fenced in area, but does not have a covenant/deed notice.
- Approximately 275 to 300 barrels of thorium waste buried from 1970 to 1976.
- Financial assurance exists for waste removal. Financial assurance is in place for both the landfill and the rad waste disposal unit.
- The decommissioning plan will be implemented when the drums are removed. Soil will be sampled. If everything checks out, will be unrestricted use.

EPA (Solid Waste Management Unit (SWMU #12))

- A RCRA Facility Assessment was performed by EPA in 1993. Solid Waste Management Units and Areas of Concern were identified.
- In 2004 EPA issued a RCRA Corrective Action Order 3008(h) Administrative Order on Consent. Identified 9 SWMUs and 2 Areas of Concern requiring investigation.
- In 2006 EPA approved the RCRA Facility Investigation Work Plan.
- In 2009 a RCRA Facility Investigation Phase II addendum was submitted to EPA for review/approval.

4. Site Tour of the Landfill – See attached facility map and pictures

5. Site Conceptual Model for Landfill

- A deed restriction is required to be filed with the County Recorder upon completion of landfill closure activities, before it enters the post-closure period (required by IDNR).
- Planned use post-closure is habitat for wildlife.
- A fence around the landfill (beyond the waste boundary) is required through post closure.
- IDNR permit renewal is going out in the next 2 or 3 weeks.

Installation of New Groundwater Monitoring Wells

- Three offsite well clusters were proposed to be installed to the east of Osage Street
- EPA suggested that a well cluster be placed along the right-of-way of US Hwy 34 to evaluate potential vapor intrusion threats to nearby residence
- IDNR would like to see the new wells installed in the Spring of 2016

- Revised map figure showing proposed well locations expected to be submitted in one month. EPA and IDNR will review and approve the transmittal letter and the revised figure.
- Wellman will contact DOT and adjacent property owner regarding access.
- Sampling of new wells targeted for March and September 2016

6. Goals and Expectations Discussion

- IDPH will be kept in the loop specific to the landfill and low level rad waste burial site. IDPH will be copied on correspondence and also offered the opportunity to participate in future meeting/conference calls discussing results of groundwater sampling at the facility.
- IDNR and EPA will coordinate not only on the landfill and low level rad waste burial site, but will coordinate for matters pertaining to the site-wide investigation work, etc. IDNR and EPA will copy each other on correspondence and will participate in conference calls/meetings, as needed.

7. Summary of Meeting on Landfill Discussion

Action Items:

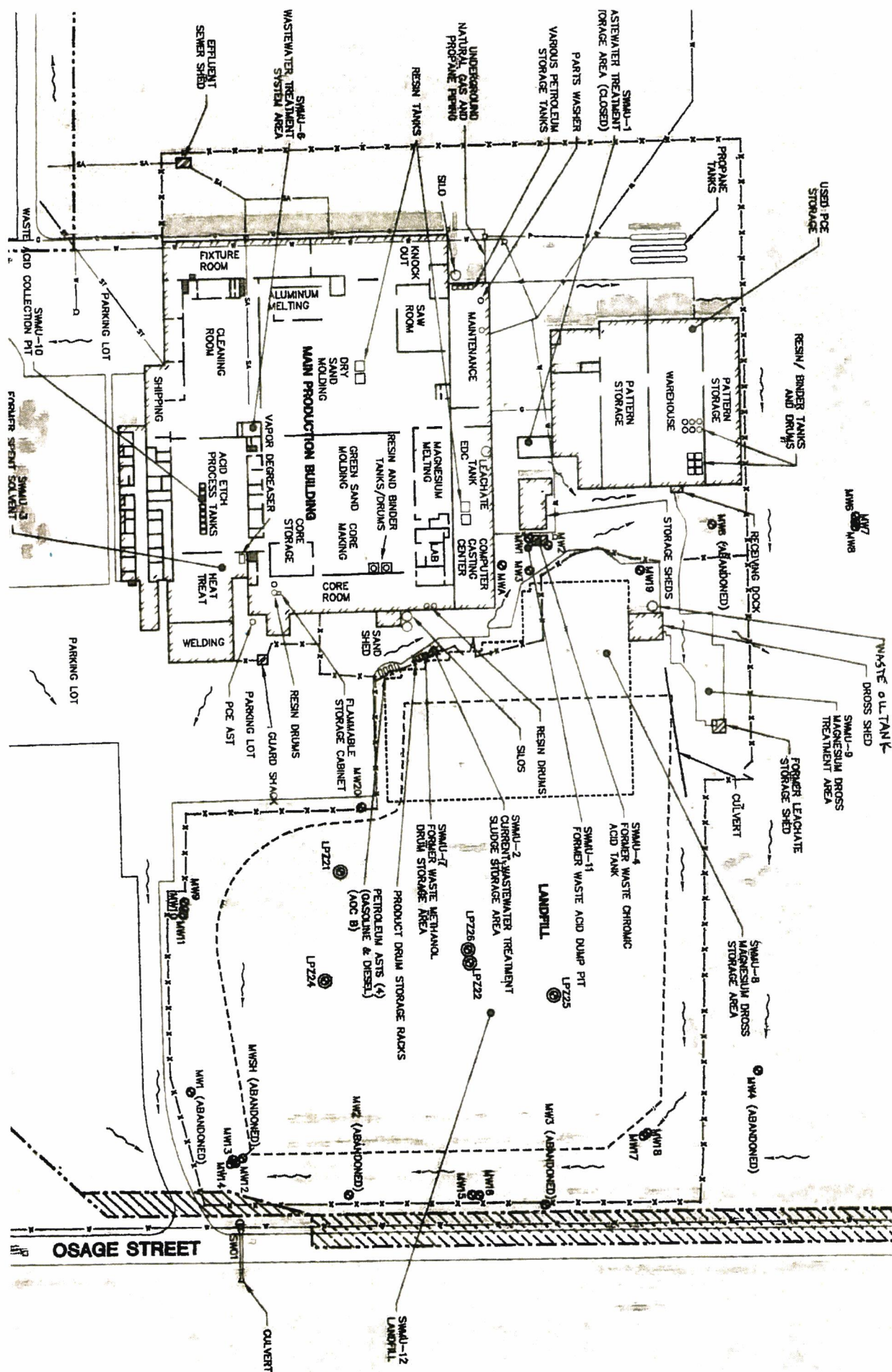
1. Wellman: Revise map with new well locations and prepare transmittal letter (expect transmittal to EPA and IDNR within a month of meeting).
2. EPA/IDNR: Review proposed well locations, coordinate on review, and EPA and IDNR transmit response letters back to Wellman.
3. Wellman: Obtain offsite access for new wells
4. Wellman: Develop schedule for well installation and sampling events. Provide proposal to EPA and IDNR.
5. EPA: Check with QA Office regarding existing QAPP, and provide comments to Wellman. EPA to coordinate with IDNR on establishing reporting limits/levels for future groundwater sampling events.

8. Discussion of RCRA Corrective Action and Facility Investigation Work – EPA and Wellman Dynamics

- Schedule 2-day meeting at facility to discuss results of RCRA Facility Investigation, data gaps, proposed Phase II RFI Work Plan, EPA comments on proposed work plan, Corrective Action Framework, RFI Reporting, etc. Meeting is tentatively proposed for October 2015.

9. Summary of Meeting on RCRA Corrective Action Work

- EPA to get back to Wellman with proposed dates for 2-day meeting in October to discuss RCRA Corrective Action LEAN tools, and the sampling and analysis work for completing the RCRA facility investigation and reporting the results.





Wellman Dynamics
Corporation, Creston, IA
Landfill (facing east)
07 August 2015



Wellman Dynamics
Corporation, Creston, IA
Landfill (facing east)
07 August 2015



Wellman Dynamics
Corporation, Creston, IA
Landfill Berm and
Groundwater Monitoring
Well, MW-20 (facing south)
07 August 2015



Wellman Dynamics
Corporation, Creston, IA
Thorium Disposal Cell
Location (facing north)
07 August 2015

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Commented [MBL1]: Comment #1

Commented [MBL2]: Comment #2

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Commented [MBL3]: Comment #3

Z

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